

**FILED**

MAR 25 2015

DAVID CREWS, CLERK  
BY *D. Adams* Deputy

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:15CR014

STEVEN NASH FINN

18 U.S.C. § 371  
16 U.S.C. § 470ee  
18 U.S.C. § 1361  
18 U.S.C. § 2

**INDICTMENT**

The Grand Jury Charges that:

**COUNT ONE**

From on or about June 2013 to on or about July 13, 2014, in the Northern District of Mississippi and elsewhere, STEVEN NASH FINN, defendant, and Jerome Daniel Young, not named as a defendant herein, did knowingly and willfully conspire and agree together and with each other and with other individuals both known and unknown to the Grand Jury, to commit the following offenses against the United States, that is:

- (1) knowingly and unlawfully excavating, removing, damaging, and otherwise altering and defacing archeological resources located on designated historic public lands without having a permit to do so, wherein the cost of restoration and repair plus the commercial value of the resources is greater than \$500.00, in violation of Title 16, United States Code, Section 470ee; and
- (2) willfully injuring and committing depredation against property of the United States, or any department or agency thereof, wherein the damage inflicted by the defendants exceeded the sum of \$1000.00, in that the defendants probed, dug, and caused irreparable injury to a Native American burial mound located on United States Corp of Engineers property in Monroe

County, Mississippi, adjacent to the Tennessee-Tombigbee Waterway, in violation of Title 18, United States Code, Section 1361.

During and in furtherance of the conspiracy and to effect the objects of the conspiracy, at least one of the co-conspirators committed at least one of the following overt acts:

(a) On or about July 13, 2014, STEVEN NASH FINN and Jerome Daniel Young excavated and removed Native American artifacts from a Native American burial mound located on United States Corp of Engineers property in Monroe County, Mississippi, adjacent to the Tennessee-Tombigbee Waterway.

All in violation of Title 18, United States Code, Section 371.

### **COUNT TWO**

On or about July 13, 2014, in the Northern District of Mississippi, STEVEN NASH FINN, defendant, and Jerome Daniel Young, not named as a defendant herein, aided and abetted by each other and by others known and unknown to the Grand Jury, did knowingly and unlawfully excavate, remove, damage, and otherwise alter and deface archeological resources located on designated historic public lands without having a permit to do so, wherein the cost of restoration and repair plus the commercial value of the resources is greater than \$500.00, in violation of Title 16, United States Code, Section 470ee, and Title 18, United States Code, Section 2.

### **COUNT THREE**

On or about July 13, 2014, in the Northern District of Mississippi, STEVEN NASH FINN, defendant, and Jerome Daniel Young, not named as a defendant herein, aided and abetted by each other and by others known and unknown to the Grand Jury, did willfully injure and commit depredation against property of the United States, or any department or agency thereof, wherein the damage inflicted by the defendants exceeded the sum of \$1000.00, in that the defendants

probed, dug, and caused irreparable injury to a Native American burial mound located on United States Corp of Engineers property in Monroe County, Mississippi, adjacent to the Tennessee-Tombigbee Waterway, in violation of Title 18, United States Code, Section 1361, and Title 18, United States Code, Section 2.

### **FORFEITURE NOTICE**

The allegations contained in Counts One through Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 16, United States Code, Section 470gg(b) and Title 28, United States Code, Section 2461(c).

Upon conviction of one or more of the offenses in violation of 16 U.S.C. § 470ee set forth in Counts One through Three of this Indictment (including conspiracy to violate 16 U.S.C. § 470ee as set forth in Count One), defendant STEVEN NASH FINN shall forfeit to the United States pursuant to 16 U.S.C. § 470gg(b) and 28 U.S.C. § 2461(c) all archeological resources obtained or removed from the land by the defendant in violation of the aforesaid statutes and any articles, devices, and other things possessed or used in violation of 16 U.S.C. § 470ee, including any material, equipment or apparatus used or intended to be used in the illegal search for or transport of archeological resources.

If any of the forfeitable property described above, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), incorporated by 28 U.S.C. § 2461(c).

All pursuant to 16 U.S.C. § 470gg(b) and 28 U.S.C. § 2461(c).

A TRUE BILL

  
UNITED STATES ATTORNEY

/s/ Signature Redacted  
FOREPERSON